

1 Andrew G. Watters  
2 555 Twin Dolphin Drive, Ste. 135  
3 Redwood City, CA 94065  
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8 Pro se  
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11 UNITED STATES DISTRICT COURT FOR THE  
12 WESTERN DISTRICT OF WASHINGTON

13 ANDREW G. WATTERS,

14 Case No.: 2:23-cv-00755-RSL

15 Plaintiff,

16 STATUS REPORT

17 vs.

18 MAHSA PARVIZ,

19 Defendant.

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## INTRODUCTION

2 As shown in the attachment, Defendant demanded on May 25, 2023 that Plaintiff not  
3 contact her in any way, and instead contact attorney Thomas Bundy, Esq. in California. Mr.  
4 Bundy was (according to Defendant) representing Defendant in this matter. Plaintiff attempted  
5 to respect Defendant's wishes and accordingly reached out to Mr. Bundy several times, starting  
6 on June 12, 2023 when the order for a joint status report and Rule 26(f) conference was filed.  
7 Finally, two weeks later on June 26, 2023, Mr. Bundy replied stating he does not represent  
8 Defendant in this matter. Setting aside Defendant's directive to contact Mr. Bundy, it is not  
9 possible to have a traditional meet-and-confer with a Federal prisoner for logistical reasons.  
10 Plaintiff therefore files this joint status report with empty responses from Defendant.  
11

12 1. Plaintiff: This is a case of computer fraud (18 U.S.C. sec. 1030) and related state  
13 law claims arising out of a prisoner's former use of the internet to impersonate an accomplished  
14 medical researcher from Harvard by hacking the Harvard web server and posting fake web  
15 pages. The matter is not complex, in that it primarily relates to Defendant's impersonation and  
16 Plaintiff's resulting financial loss.  
17

18

19 Defendant: No response received.

20 2. Plaintiff: There are no additional parties to be joined.  
21

22 Defendant: No Response received.  
23

24 3. Plaintiff: Plaintiff consents to a Magistrate Judge ("yes").  
25

26 Defendant: No Response received.  
27

28 4. Plaintiff: There are no related cases, although Defendant has threatened to file a  
Domestic Violence proceeding in California.

Defendant: No Response received.

1       5. Plaintiff: Initial Disclosures were not timely made due to Defendant's directive of  
2 no-contact and her claimed attorney not actually representing her, which only became known on  
3 the due date for the Rule 26(f) Conference.  
4

5                   Defendant: No Response received.  
6

7       6. Plaintiff: There is no need to change any timing of expert or pretrial disclosures.  
8

9                   Defendant: No Response received.  
10

11       7. Plaintiff: The subjects of discovery correspond to the facts in the Verified First  
12 Amended Complaint, in particular the Computer Fraud cause and Defendant's vexatious  
13 litigation history. Although the Answer is verified, it solely contains a general denial and not  
14 specific denials of particular allegations. As such, Plaintiff intends a Motion for Judgment on the  
15 Pleadings to resolve the action as expeditiously as possible. The timing of discovery should take  
16 around nine months, partially necessitated by the interstate nature of the case. The phases of  
17 discovery should be: (1) document production and written discovery, three to six months; (2)  
18 deposition of Defendant in six to nine months; (3) expert discovery at the nine month mark.  
19 Plaintiff intends to obtain information and then move for summary judgment if the action is not  
20 already resolved through other means.

21                   Defendant: No Response received.  
22

23       8. Plaintiff: There are no agreements concerning discovery information, although  
24 Plaintiff is open to a protective order for sensitive information produced in discovery.  
25

26                   Defendant: No Response received.  
27

28       9. Plaintiff: There is ESI in this case in the form of email messages and web pages.  
Plaintiff has preserved all ESI and will adopt the Model Agreement.

Defendant: No Response received.

10. Plaintiff: This action does not involve any unique or extensive claims of privilege or work product, although Defendant is expected to continue filing documents under seal for reasons unknown.

Defendant: No Response received.

11. Plaintiff: There is no risk of inadvertently disclosed privileged information, but in the event any privileged matter is inadvertently disclosed, retraction and destruction are appropriate.

Defendant: No Response received.

12. Plaintiff: There is no necessary change to the limitations on discovery.

Defendant: No Response received.

13. Plaintiff: Discovery can be completed in nine months, which is April 10, 2024.

Defendant: No Response received.

14. Plaintiff: The only anticipated motions are a Motion for Judgment on the Pleadings by Plaintiff and cross-motions for summary judgment by each party. The case will be resolved as expeditiously as possible through these motions or by way of trial, and Plaintiff does not currently have any suggested phasing.

Defendant: No Response received.

15. Plaintiff: Plaintiff does not intend to participate in ADR beyond the required settlement conference.

Defendant: No Response received.

16. Plaintiff: The case will be ready for trial in May 2024 and there are no conflicts, although Plaintiff has a jury trial currently set for June 3, 2024 that is 95% likely to proceed

Defendant: No Response received

1 17. Plaintiff: Non-jury.

2 Defendant: No Response received.

3 18. Plaintiff: One to two days for a non-jury trial. Two days for a jury trial, not  
4 including jury selection.

5 Defendant: No Response received.

6 19. Plaintiff: There are no corporate parties and no disclosure statements needed.

7 Defendant: No Response received.

8 Plaintiff:

9 Dated: July 10, 2023

*Andrew G. Watters*

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10 13 Andrew G. Watters  
11 14 Pro se

12 16 Defendant: No Response received.

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5 **Exhibit A**  
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From: Mahsa Parviz  
To: Andrew G. Watters

May 25<sup>th</sup>, 2023  
via USPS RRR No. 7011150000197938427

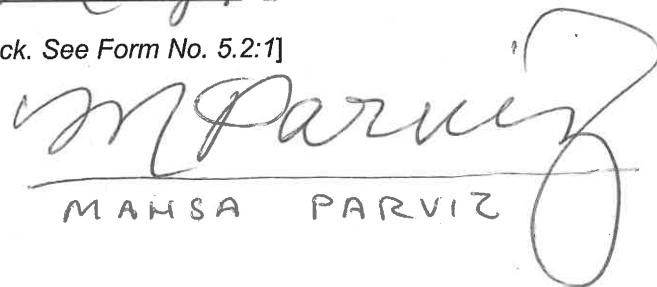
Please take notice of filing  
under seal on May 25<sup>th</sup>, 2023:  
Verified Rule 12 Motion,  
Answer, Motion for Sanctions  
Under Rule 11 and/or 28 U.S.C.  
§ 1927, AND REQUEST FOR  
PROTECTIVE ORDER UNDER  
RULE 5.2(e). A hearing  
will take place on Friday,  
June 9<sup>th</sup>, 2023.

All further communication  
must be made through my  
attorney, Thomas M. Bundy, Esq.  
(909) 281-3500, thomas@bundy-law.com.  
Do NOT contact me directly.

Dated:

May 25<sup>th</sup>, 2023

[Signature block. See Form No. 5.2:1]

  
M Parviz  
MAHSA PARVIZ

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5 **Exhibit B**  
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**Subject:** Re: Watters v. Parviz - 2:23-cv-00755-RSL (W.D. Wash.)

**From:** Thomas Bundy <thomasmbundy@yahoo.com>

**Date:** 6/26/23, 10:24 AM

**To:** "Andrew G. Watters" <[andrew@andrewwatters.com](mailto:andrew@andrewwatters.com)>

**CC:** [thomas@bundy-law.com](mailto:thomas@bundy-law.com)

I won't be representing her in the Washington case

Sent from my iPhone

On Jun 26, 2023, at 9:57 AM, Andrew G. Watters <[andrew@andrewwatters.com](mailto:andrew@andrewwatters.com)> wrote:

Hi Thomas,

Just following up-- I was ordered to meet and confer and she said to only contact you...please let me know either way whether you represent Ms. Parviz.

Best,

Andrew G. Watters  
[andrew@andrewwatters.com](mailto:andrew@andrewwatters.com)  
+1 (415) 261-8527  
<https://www.andrewwatters.com>

On 6/20/2023 3:38 PM, Andrew G. Watters wrote:

Hi Thomas,

Any decision yet on the representation? Please let me know.

Thanks,

Andrew G. Watters  
[andrew@andrewwatters.com](mailto:andrew@andrewwatters.com)  
+1 (415) 261-8527  
<https://www.andrewwatters.com>

On 6/12/2023 1:35 PM, Thomas Bundy wrote:

She has requested that I represent her. I have not yet accepted the representation but it's obviously difficult communicating with her while she is in prison. I'll let you know when/if she officially retains me.

Sorry for the confusion

Thomas

Sent from my iPhone

On Jun 12, 2023, at 12:26 PM, Andrew G. Watters <[andrew@andrewwatters.com](mailto:andrew@andrewwatters.com)> wrote:

Dear Mr. Bundy,

Ms. Parviz sent me a note expressly asking me to not contact her and to only contact you, whom she represented to be her attorney.

Please confirm that you represent Ms. Parviz, as the court has set deadlines for a joint status report, etc. as indicated in the enclosed order.

Thank you,

Andrew Watters

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Andrew G. Watters  
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+1 (415) 261-8527  
<https://www.andrewwatters.com>

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